

1 Code, Sections 841(a)(1) and 846, that is Distribution of Marijuana and Conspiracy to
2 Distribute Marijuana, specifically involving the interstate distribution of marijuana from
3 Washington to other locations outside the State of Washington, in violation of Title 21,
4 United States Code, Section 843(b).

5 All in violation of Title 21, United States Code, Section 846.

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7 **COUNT 2**
8 **(Conspiracy to Commit Money Laundering)**

9 Beginning on a date unknown, but at least by the middle of 2016, and continuing
10 until October 2018, in King County within the Western District of Washington, and
11 elsewhere, HOAN THAI TRAN and others known and unknown, unlawfully and
12 knowingly combined, conspired, confederated and agreed together and with each other to
13 conduct and attempt to conduct financial transactions, that is transactions involving the
14 movement of funds by wire and other means affecting interstate and foreign commerce,
15 specifically the interstate transportation of cash and monetary instruments via United
16 States Postal Service and other means, which financial transactions in fact involved the
17 proceeds of specified unlawful activity, that is, Conspiracy to Use Communication
18 Facility to Commit a Federal Felony Controlled Substances Offense, Distribution of
19 Marijuana, and Conspiracy to Distribute Marijuana, in violation of Title 21, United States
20 Code, Sections 843(b), 841(a)(1), and 846, knowing that the transactions are designed in
21 whole or in part to conceal and disguise the nature, the location, the source, the
22 ownership, and the control of the proceeds of the specified unlawful activity, in violation
23 of Title 18, United States Code, Section 1956(a)(1)(B)(i).

24 All in violation of Title 18, United States Code, Section 1956(h).

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The allegations in Count 1 of this Information are hereby realleged and incorporated by reference herein for the purpose of alleging forfeiture to the United States pursuant to Title 21, United States Code, Section 853.

Money Laundering Offense

Upon conviction of the felony offense in violation of Title 18, United States Code, Section 1956, as charged in Count 2, HOAN THAI TRAN shall forfeit to the United States of America any property, real or personal, involved in the offense, and any property traceable to such property.

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been diminished in value; or

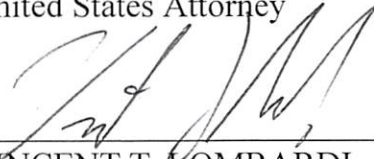
1 e. has been commingled with other property which cannot be divided without
2 difficulty,
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5 it is the intent of the United States, pursuant to Title 21, United States Code, Section
6 853(p), to seek the forfeiture of any other property of the defendants up to the value of
7 the above-described forfeitable property.


8 DATED this 15th day of August, 2019.
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BRIAN T. MORAN

United States Attorney

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VINCENT T. LOMBARDI

Assistant United States Attorney

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SARAH Y. VOGEL

Assistant United States Attorney
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